

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 JOSEPH D. BARTON  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099  
5

6 Attorneys for Plaintiff  
United States of America  
7

8 IN THE UNITED STATES DISTRICT COURT  
9  
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 5:23-MJ-00021-CDB

11 v.  
12 Plaintiff,

**STIPULATION RE TREATMENT OF  
PROTECTED INFORMATION; [PROPOSED]  
ORDER**

13 MIGUEL MAGANA MARTINEZ

14 Defendants.  
15

16  
17 WHEREAS, the discovery in this case contains a large amount of personal identifying  
information, including personal identification numbers, dates of birth, financial account numbers,  
telephone numbers, and residential addresses (“Protected Information”); and

20 WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the  
21 unauthorized disclosure of Protected Information to anyone not a party to this case;

22 The parties agree that entry of a stipulated protective order is appropriate.

23 THEREFORE, the parties stipulate as follows:

24 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the  
26 defendant’s counsel in this case;

27 2. By signing this stipulation, defense counsel agrees not to share any discovery that  
28 contains Protected Information with anyone other than defense counsel and defense counsel’s

1 investigators and support staff. Defense counsel may permit the defendant to view unredacted discovery  
2 that contains Protected Information in the presence of defense counsel and defense counsel's  
3 investigators and support staff. But defense counsel shall not allow the defendant to copy the Protected  
4 Information and may only provide the defendant with copies of discovery from which the Protected  
5 Information has been redacted;

6       3. The discovery may be used only in connection with the litigation of this case. The  
7 discovery is now and will remain the property of the government. Defense counsel will return the  
8 discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

9       4. Defense counsel will store the discovery in a secure place and will use reasonable care to  
10 ensure that it is not disclosed to third persons in violation of this agreement; and

11       5.      In the event that the defendant substitutes counsel, undersigned defense counsel agrees to  
12 withhold discovery from the new counsel until substituted counsel agrees to be bound by this stipulation  
13 and resulting order.

## IT IS SO STIPULATED.

16 | DATED: June 21, 2023

/s/ Alekxia Torres-Stallings

Alekxia Torres-Stallings  
Counsel for Miguel Martinez

19 | DATED: June 21, 2023

/s/ Joseph Barton

**Joseph Barton**  
Assistant United States Attorney

1 PHILLIP A. TALBERT  
United States Attorney  
2 JOSEPH D. BARTON  
Assistant United States Attorney  
3 2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
4 Telephone: (559) 497-4000  
Facsimile: (559) 497-4099  
5

6 Attorneys for Plaintiff  
United States of America  
7

8 IN THE UNITED STATES DISTRICT COURT  
9  
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 5:23-MJ-00021-CDB

11 Plaintiff,

**[PROPOSED] ORDER**

12 v.

13 MIGUEL MAGANA MARTINEZ

14 Defendants.  
15

16

17 **[PROPOSED] ORDER**

18 For good cause shown, the stipulation between counsel, dated June 21, 2023, in *United States v.*  
19 *Miguel Martinez*, 5:23-MJ-00021-CDB, regarding the treatment of protected information contained in  
20 the discovery, is approved.

21 IT IS SO ORDERED.

22 Dated: June 21, 2023



23  
UNITED STATES MAGISTRATE JUDGE  
24  
25  
26  
27  
28